

To: FDADockets@OHRM-MAIL@FDAOC  
From: "Tom Lent" <tlent@econet.org>  
Certify: N  
Subject: Docket #98N-1038  
Date: Tuesday, March 30, 1999 at 0:47:30 am EST  
Attached: None

(1) Does the current radiation disclosure statement convey meaningful information to consumers in a truthful and nonmisleading manner?

YES. I think the current disclosure statement is a truthful non inflammatory statement about a highly controversial topic and I see no rationale for making it less conspicuous.

(2) How do consumers perceive the current radiation disclosure statement -- as informational, as a warning, or as something else?

I perceive it as informational and perceive that others think the same.

(3) Does the wording of the current radiation disclosure statement cause "inappropriate anxiety" among consumers? What are examples of "inappropriate anxiety"?

NO. It does not say that it is a warning. Any anxiety is only a result of other information that consumers might have from other sources.

(4) What specific alternate wording for a radiation disclosure statement would convey meaningful information to consumers, in a truthful and nonmisleading manner, and in a more accurate or less threatening way than the current wording?

I think the FDA has done a fine job of balancing concerns in the current wording, location and emphasis and do not think that any of it should be minimized any further.

(5) Would consumers be misled by the absence of a radiation disclosure statement in the labeling of irradiated foods?

YES. Consumers would be misled by the absence of the statement. Regardless of the status of current testing, consumers have the right to be informed of food preparation procedures that are as controversial as this one. It is important to remember that an important issue of controversy involved is not just whether the food itself is safe and healthy to consume after irradiation, but also whether the industrial use of radiation in this manner is appropriate and safe for workers and the environment.

5B) Are consumers misled by the presence of such a statement?  
NO. It is very appropriate.

(6) With respect to foods containing irradiated ingredients, are consumers misled by the absence of a radiation disclosure statement? Would consumers be misled by the presence of such a statement?

SAME AS ABOVE

Thank you

Tom Lent

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